

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WALTER BECK CORPORATION d/b/a THE	)	CIVIL DIVISION
RAINBOW INN,	)	
	)	Civil Action No. 04-348 - Erie
Plaintiff,	)	
	)	JUDGE MAURICE B. COHILL, JR.
vs.	)	
	)	
SAFECO CORPORATION, AMERICAN	)	
ECONOMY INSURANCE COMPANY, and	)	<b><u>ELECTRONICALLY FILED</u></b>
AMERICAN STATES INSURANCE	)	
COMPANY,	)	
	)	
Defendants.	)	

**DISCOVERY DISPUTE CERTIFICATE**

The undersigned counsel hereby certifies that, pursuant to the Federal Rules of Civil Procedure and Local Rule 7.1.C and 37.1, as well as this Court's January 31, 2007 Order of Court (Docket No. 36), he has made a reasonable effort to reach agreement with opposing counsel on the matters set forth in Plaintiff's Motion for Discovery Sanctions Pursuant to Rule 37 ("Motion") (Docket No. 34). The undersigned contacted opposing counsel via telephone on February 8, 2007 and discussed an amicable resolution to the Motion, but counsel for the parties were not able to agree upon such.

MEYER, UNKOVIC & SCOTT LLP

By: /s/ Joshua R. Lorenz  
 Richard T. Victoria  
 Pa. I.D.#76681  
 rtv@muslaw.com  
 Joshua R. Lorenz  
 Pa. I.D.#84397  
 jrl@muslaw.com

MEYER, UNKOVIC & SCOTT LLP  
1300 Oliver Building  
Pittsburgh, PA 15217  
(412) 456-2800  
Fax: (412) 456-2864

Counsel for Plaintiff

Dated: February 8, 2007

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the within Discovery Dispute Certificate was served upon counsel for the Defendants by electronic service this 8<sup>th</sup> of February, 2007 at the following address:

Daniel P. McDyer, Esquire  
ANSTANDIG, McDYER & YURCON, P.C.  
1300 Gulf Tower  
707 Grant Street  
Pittsburgh, PA 15219

MEYER, UNKOVIC & SCOTT LLP

By: /s/ Joshua R. Lorenz

Richard T. Victoria  
Pa. I.D.#76681  
rtv@muslaw.com  
Joshua R. Lorenz  
Pa. I.D.#84397  
jrl@muslaw.com

MEYER, UNKOVIC & SCOTT LLP  
1300 Oliver Building  
Pittsburgh, PA 15217  
(412) 456-2800  
Fax: (412) 456-2864

Counsel for Plaintiff